



February 22, 2008

**BY ELECTRONIC COMMENT FILING SYSTEM**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: EB Docket No. 06-36 – Evercom Systems, Inc.**

Dear Ms. Dortch:

In accordance with the FCC Public Notice, DA 06-36, released February 2, 2006,  
enclosed is the compliance filing of Evercom Systems, Inc.

Sincerely yours,

A handwritten signature in cursive script that reads 'Yolanda Jones'.

Yolanda Jones  
Regulatory Compliance Analyst



Annual 64.2009(e) CPNI Certification for 2008

EB Docket No. 06-36

Date filed: February 22, 2008

Name of company covered by this certification: Evercom Systems, Inc.

Form 499 Filer ID: 818026

Name of signatory: Robert Rae

Title of signatory: Executive Vice President Operations & Information Technology

I, Robert Rae, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed

A handwritten signature in black ink, appearing to be 'R. Rae', written over a horizontal line.

**Attachment 1**

Evercom Systems, Inc. ("Evercom" or the "Company") offers telecommunications services to inmates at confinement facilities, including the ability for inmates to complete interstate and international prepaid and collect calls ("inmate calling services"), pursuant to contracts that the Company enters with the administrators of the individual facilities.

To the extent that Evercom collects any customer proprietary network information ("CPNI") in providing such services, the Company has internal procedures in place to ensure the security of the data, including its retention in secure password-protected files and other network access security measures. Employees are trained and understand the requirements to keep such information confidential.

Any such information is not sold, rented or otherwise made available to third parties, except to the extent permitted by applicable law and regulation (e.g., 47 U.S.C. 222(d)), including to ensure that inmates do not make fraudulent, abusive or illegal use of telecommunications privileges afforded by the confinement facility administrators.

Evercom does not make CPNI available to its sales personnel and does not use, disclose or permit access to CPNI for internal marketing purposes (i.e., for the marketing among classes of services). In light of the limited, foregoing nature of Evercom's telecommunications services, Evercom does not maintain either an "opt-in" or "opt-out" system with respect to CPNI.

Evercom's Executive Vice President, Robert Rae, understands that the FCC CPNI Rules govern Evercom's use and control of any CPNI purposes. Mr. Rae also is the individual in the company responsible for establishing and overseeing procedures to maintain the security of any CPNI collected by Evercom in the course of providing inmate calling services.